

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

KAREN COCHENOUR, individually and on )  
behalf of others similarly situated, )  
  )  
Plaintiff, )  
  ) Civil Action No. 1:25-CV-00007-RP  
v. )  
  )  
360TRAINING.COM, INC., D/B/A )  
MORTGAGE EDUCATORS AND )  
COMPLIANCE, INC., )  
  )  
Defendant. )

**NOTICE OF CONSTITUTIONAL QUESTION**

To: Pamela Bondi  
Attorney General for the United States  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

**PLEASE TAKE NOTICE**, pursuant to Fed. R. Civ. P. 5.1(a)(1)(A), that Defendant 360training.com, Inc., d/b/a Mortgage Educators and Compliance's Motion to Dismiss Plaintiff's Class Action Complaint questions the constitutionality of the federal Video Privacy Protection Act, 18 U.S.C. § 2710. Specifically, Defendant argues that the VPPA is an unconstitutional restraint on speech in violation of the First Amendment of the United States Constitution. A copy of Defendant's Motion to Dismiss and this Notice of Constitutional Question will be served upon the United States Attorney General.

Dated: March 5, 2025

Respectfully submitted,

/s/ Rachel Palmer Hooper

Rachel Palmer Hooper  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was electronically filed on March 5, 2025 with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record. I further certify that a true and correct copy of the foregoing document was served via certified mail on the following:

Pamela Bondi  
Attorney General for the United States  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

/s/ Rachel Palmer Hooper